

ORIGINAL
FILE

RECEIVED

JUN - 2 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference)
for 0+ InterLATA Calls)

CC Docket No. 92-77

COMMENTS OF U.S. LONG DISTANCE, INC.

9311 San Pedro, Suite 300
San Antonio, Texas 78216

W. Audie Long, Esq.
Kenneth F. Melley, Jr.

June 2, 1992

No. of Copies rec'd
List A B C D E

0+9

TABLE OF CONTENTS

RECEIVED

JUN - 2 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

INTRODUCTION	1
 I. <u>PROPRIETARY CALLING CARDS AND "0+" ACCESS</u>	
1. How should the end user be made to decide between receiving and utilizing proprietary IXC cards and non-proprietary LEC cards?	5
2. How IXCs would distinguish and screen proprietary and non-proprietary cards?	7
3. Whether carriers should be obligated merely to instruct card holders to dial access codes, or whether they should also be required to reject "0+" calls by customers using proprietary calling cards.	9
4. What information would have to be made available to enable OSPs to carry and bill for non-proprietary "0+" calls?	12
5. The impact the above described proposal would have on consumers.	13
6. The impact this proposal might have on the costs and benefits of billed party preference or the timeliness with which it could be implemented.	14
7. Alternatives to Billed Party Preference	15
 CONCLUSION	17

SUMMARY

U.S. Long Distance, Inc. (USLD) acknowledges the uncertainty facing the Consumer in regards to the Operator Service industry today. Frustration and confusion over network accessibility and the failure of certain dialing procedures, as prescribed by a certain calling card issuer, to result in the expeditious processing of the end user's long distance call have provided the impetus for this proceeding. USLD examines the seven topics raised by the Commission in this Docket, and concludes that in order to eliminate Consumer dissatisfaction, AT&T must be held accountable for its furtive CIID calling card marketing campaign and contribute to the advancement of Consumer awareness in regards to the Operator Service industry by either reissuing the card with specific instructions to card holders on how to access AT&T on the first call attempt from any telephone, or allow the CIID card to be billable on a "0+" basis from all aggregator locations, as they have lead the Consumer to expect.

USLD believes the end user can be made to decide between receiving and utilizing proprietary IXC cards and non-proprietary LEC cards if he is honestly informed of the benefits and drawbacks each card presents. USLD draws an analogy to the commercial credit card industry, in which Consumers have been educated as to the intricacies each card possesses, and in which the Consumer is able to make an informed choice as to whether to carry a certain card,

or more than one, so that the decision to use one may be made at the point of sale. USLD believes the Consumer is less than familiar with the intricacies of the different types of calling cards, and is therefore exposed to misleading marketing campaigns.

USLD states that IXCs can currently distinguish between proprietary and non-proprietary calling cards, but not before certain expenses are incurred, expenses which are non-recoverable on calls made with proprietary cards.

USLD elaborates on the issue of requiring an IXC to reject its own "0+" dialed proprietary card calls. While this prospect seems less than a desirable alternative for the Consumer, the Commission is in the position to ensure that such an incidence rarely occurs. If the Consumer is aware that a proprietary card requires proprietary access dialing, such a policy would not be necessary. If a particular carrier's card holders persistently attempt to complete calls on a "0+" basis, then it is in those card holders' best interest to arrange to allow all OSPs to carry their "0+" call and use that carrier's card as a billing mechanism.

USLD states that since certain telecommunications entities currently are capable of accepting AT&T's CIID card as a billing mechanism, then the means exist by which all OSPs could be afforded the same capability.

USLD states that its proposals would serve to benefit the Consumer on all fronts. Those AT&T CIID card holders who sincerely want to reach AT&T can do so by dialing 10288-0, or 1-800 CALL ATT.

Those who prefer the convenience of "0+" dialing would be afforded that capability as well, as all OSPs could complete their "0+" call with the AT&T card.

USLD states that its proposals could provide the benefits the Commission seeks in regards to the Billed party Preference proposal before them. Not only would Consumers be permitted to make a conscious decision as to the carrier of their preference, they could also make such a decision at the point of sale, based upon the prevailing benefits offered by any card issuer.

USLD concludes that the most satisfied Consumer is the one who is aware of what he is buying. Fair competition in the calling card market place will benefit the Consumer. As the Consumer grows more aware of the alternatives available to him, competitive IXC's will compete for his business by designing and offering those products which the Consumer truly desires.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUN - 2 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference)
for 0+ InterLATA Calls)

CC Docket No. 92-77

COMMENTS OF U.S. LONG DISTANCE, INC.

U.S. Long Distance, Inc. ("USLD") hereby submits its comments on the proposal for restricting the use of proprietary calling cards on 0+ calling in the Notice of Proposed Rulemaking in CC Docket No. 92-77 ("Notice").

INTRODUCTION

In 1989 the Common Carrier Bureau initiated a tariff investigation to examine certain practices of Cincinnati Bell Telephone (CBT) relating to the issuance and validation of telephone calling cards. Parties to that investigation maintained that many of the issues examined therein were not limited to CBT. On May 24, 1991, the Commission released the CBT Final Order requiring the Local Exchange Carrier (LEC) to provide nondiscriminatory access to its calling card information for use by any interexchange carrier (IXC), and issued a Notice of Proposed Rulemaking, CC Docket No. 91-115, in which it sought information on all LEC calling card practices, proposing to require all LECs to provide IXCs access to certain information and services for LEC joint use calling cards.

On December 20, 1991, the Competitive Telecommunications Association (CompTel), on behalf of nineteen telecommunications companies including USLD, filed in CC Docket No. 91-115 an

Emergency Motion for an Interim Order Requiring AT&T to Cease Further Distribution of "Proprietary" CIID Cards and Permit Validation and Billing of Existing Cards Pending a Final Decision in This Docket ("Emergency Motion"). In the Emergency Motion, CompTel specifically enumerated the devastating impact experienced by competitive Operator Service Providers resulting from the proliferation of AT&T's proprietary calling card. Not only are these calling cards inadequate billing mechanisms for Consumers attempting to place a long distance call over a competitive Operator Service Provider's network due to their proprietary nature, the means by which AT&T mislead the card's unsolicited recipients to "discard" their LEC card, an adequate billing mechanism for Consumers attempting to place long distance calls with competitive Operator Service Providers, was causing tremendous Consumer confusion and frustration.

Joint Comments on Emergency Motion for an Interim Order filed on behalf of Zero Plus Dialing, Inc., OAN Services, Inc., and Resurgens Communications Group on February 10, 1992, provided specific data indicating that competitive Operator Service Providers were experiencing unbillable AT&T proprietary calling card attempts on more than 30% of all "0+" call attempts. 30% of Consumers, therefore, experienced confusion and frustration by being unable to place a long distance call in the manner which they had been instructed.

On May 8, 1992, the Commission released a Report and Order and Request for Supplemental Comment in CC Docket No. 91-115 without ruling on the Emergency Motion. On that same date, a

Notice of Proposed Rulemaking, CC Docket No. 92-77 was released in which the Commission requested comment on the proposed implementation of a Billed Party Preference System for 0+ InterLATA calls, while also requesting comment on an expedited pleading cycle concerning its proposal to mandate the use of proprietary calling card calls, such as those made in conjunction with the AT&T CIID card, only in those cases where the card holder first dials a proprietary access code, such as 1-800/950 or 10XXX.

Specifically, the Commission seeks comment on: (1) how and by whom the choice between a proprietary access code card and a nonproprietary 0+ card should be made; (2) how IXCs would distinguish and screen proprietary and nonproprietary card calls; (3) whether carriers should be obligated merely to instruct proprietary card holders to dial access codes, or whether they should also be required to reject 0+ calls by customers using proprietary calling cards; (4) what information would have to be made available to enable OSPs to carry and bill for nonproprietary 0+ calls; (5) the impact the above-described proposal would have on consumers; and (6) the impact this proposal might have on the costs and benefits of billed party preference or the timeliness with which it could be implemented.

USLD submits the following comments in response to the Commission's inquiries as enumerated above, and offers an alternative proposal for addressing the competitive inequities resulting from AT&T's issuance and dissemination of their CIID card. USLD proposes and supports an equitable solution which

fairly distributes the costs and benefits of Consumer calling card proliferation, and defers the perceived necessity for massive investment into a nationwide interconnected switching mechanism designed to make decisions about specific long distance call routing on behalf of the Consumer.

I. PROPRIETARY CALLING CARDS AND "0+" ACCESS

1. How should the end user be made to decide between receiving and utilizing proprietary IXC cards and non-proprietary LEC cards?

Since the benefits of end user calling cards are accorded to the card issuer, the card issuer should be responsible for educating the end user as to how the end user will benefit from its use. This education should be performed, as it is in all other aspects of our market economy, through fair, honest and equal competition.

Commercial credit cards provide an excellent analogy to this statement. Some commercial credit cards have the benefit of greater "acceptance" or potential incidence of use, others offer lower annual fees or revolving credit, while still others provide for purchases from only the merchant issuing the card. Consumers are able to freely analyze each card's benefits and drawbacks, as presented to them through competitive marketing campaigns, and base their decision to accept one upon their own lifestyles and needs. Many consumers choose to carry more than one card in order that they may make the decision as to which card provides the best set of alternatives at the point of sale.

The telecommunications Consumer, the end user, should similarly be allowed to decide between receiving and utilizing proprietary IXC cards and non-proprietary LEC cards, or both, with the benefit of full disclosure of each cards' attributes and limitations. Calling card issuers, just as commercial credit card issuers, should therefore be made responsible for presenting

their product to potential users in a fair and honest open competitive market. End users can therefore freely decide which card provides the best personal alternatives, and as a result will be far less likely to express frustration and confusion surrounding their use of any given card. Under true competition, like that experienced in the commercial credit card market, it is plain to see that the role of regulators will diminish in proportion to the increase in awareness of the Consumer's chosen product.

No commercial credit card, however, markets itself to be a "replacement" of another card, or deceptively instructs an unsolicited recipient to "discard" all others. The Consumer has benefited from fair and equal competition in the commercial credit card industry in that he possesses sufficient knowledge of the credit card product to avoid succumbing to such a ploy. AT&T, however, has successfully perpetrated this guise with their CIID calling card, taking advantage of the unfamiliarity most consumers suffer from relative to the telecommunications industry, in particular their unfamiliarity of the distinction between LECs and AT&T.

AT&T consciously chose to pursue this deceptive campaign. AT&T subsequently has fostered frustration and confusion among its own customers. In order to ensure the Consumer can benefit from fairness and equity of competition, the Commission must rule that AT&T CIID cards distributed under this precept be eliminated from the marketplace.

2. How IXCs would distinguish and screen proprietary and non-proprietary cards?

By dialing "0+" a long distance number from an aggregator location and subsequently receiving the "bong" tone, an end user has seized the switching device of the presubscribed OSP. Through data base tables built within the switching equipment, an OSP can currently determine if the caller's calling card is billable at this stage of the call. However, at this stage the OSP has incurred expenses which, in the case of a proprietary calling card, cannot be offset as there are no means in place or proposed today to compensate aggregators for providing such access. ¹

Since the name of the OSP is posted in plain view of the aggregator's telephone in accordance with Federal Regulation, ² information is available today to the caller before he accesses that OSPs network which would allow the caller to dial alternate access codes if he so desires. However, if a proprietary card issuing IXC had instructed its card holder to "... dial "0+" the long distance number, if you don't hear [carrier's name], hang up and dial 10-ATT-0," that card holder will continue to cause unbillable network usage for the presubscribed OSP, regardless of the information on the telephone, and continue to experience confusion and frustration.

¹ The FCC has determined that a flat fee of \$6.00 per pay telephone per month is adequate compensation for the expenses incurred by aggregators for providing access to 1-800/950 and 10XXX calls. This compensation, however, does not contemplate the expense of an end user's failed attempt at completing the call dialing "0+" first.

² 47 C.F.R. 64.703 (b)(1)

Having fulfilled its obligation ³ to ensure the aggregator has posted its name and provided 1-800/950 access code calling, the presubscribed OSP should not be obliged to provide means by which such card holders can continue to cause unbillable network usage. Furthermore, the Consumer should not be misled into believing it is appropriate to dial "0+" on the first call attempt with a proprietary card, as this can lead to unanticipated delays and additional dialing. The means are in place today by which such card holder can reach the issuing carrier, and thereby satisfying the caller, without experiencing confusion or frustration, and without encumbering the presubscribed OSP. These practices have proven to be successful for MCI, Sprint and many Regional IXC customers as measured by the minimal volume of unbillable call attempts they experience, as witnessed by USLD, and the non-existence of access complaints filed by these Consumers.

Therefore, any proprietary calling card issuer whose end users habitually cause such unbillable network usage should be Ordered to educate its card holding customers on access code calling, including access via 1-800/950 calling and the fact that 10XXX access is not available from all originating locations. Failing this, that card issuer should be required to provide necessary billing information in order that its customers can complete their desired call over any presubscribed OSP network on

³ 47 C.F.R. 64.704 (b)

a "0+" basis, particularly if the card issuer has instructed its customers to utilize this dialing pattern.

As stated previously, the Consumer should expect proprietary card issuers to market their product honestly and fairly, including specifically instructing them how to be ensured of accessing the card issuer's network on the first call attempt. Otherwise, it must be the card issuer who bears the burden resulting from their own customers' frustrations.

3. Whether carriers should be obligated merely to instruct card holders to dial access codes, or whether they should also be required to reject "0+" calls by customers using proprietary calling cards?

If carriers are required to instruct proprietary card holders to dial access codes, and fulfill this obligation sincerely, there would be no need to reject "0+" calls made by customers using proprietary cards, since none would be attempted.

If certain carriers persistently instruct their customers to attempt to access that carrier with proprietary calling cards by dialing "0+," imposing upon the customer unnecessary dialing, confusion and frustration, and burdening other OSP networks, then the Commission should mandate that card issuer's billing information relative to that proprietary card be made available so that these customers may complete their desired call using "0+" over all carriers' networks. This places the incentive to educate the end user properly in the hands of the card issuing IXC. For example, MCI customers are quite successfully instructed to dial 1-800 from any telephone in order to access

the MCI network. OSPs in general do not receive complaints from MCI card holders, nor do MCI card holders represent a meaningful percentage of proprietary card holders attempting to complete calls by dialing "0+."

Therefore it can be assumed that, somehow, MCI has successfully educated its customers about how to access the MCI network within the regulatory and legal restraints existing today, to such a degree that the customer is never confused nor frustrated about how to reach MCI, the presubscribed OSP is not unfairly burdened, and MCI receives and carries the calling card call.

AT&T customers, however, either because they are following the instructions AT&T has printed on its card and advertised in its commercials, or because they are not sure exactly how to place a long distance operator assisted call, appear to be regularly dialing "0+" their long distance call, as opposed to the proprietary access code (10-288-0), or (1 800 CALL ATT).

This unique differentiation of customer behavior indicates the need for a unique framework of regulatory requirements to be implemented in regards to AT&T. If an MCI customer happens to dial "0+" at an MCI presubscribed telephone, USLD believes that it is in the Consumer's best interest to be able to complete that call without forcing the Consumer to redial. While USLD believes that an AT&T customer would be best served under such a scenario, due to the preponderance of AT&T customer "0+" calls originating from aggregator locations as compared to those originating on a proprietary access code basis, implying that the AT&T customer

expects to complete the call on a "0+" basis, USLD believes it is in the Consumer's best interest to provide all OSPs the ability to carry and bill that call on a "0+" basis in order to meet that Consumer's expectations.

Whereas the Consumer will suffer unnecessarily if all carriers were required to reject "0+" calls by their own customers using the carriers' proprietary card, any Consumer who has come to expect to place a call merely by dialing "0+," whether this expectation is conveyed to the Consumer by the calling card issuer, or merely an expectation the Consumer has inherently developed, that call should be processed by the presubscribed OSP, whether or not the OSP is the same as the card issuer. AT&T specifically, then, should be required to share all validation and billing data with all OSPs in order that those card holders' calls can be connected as they expect.

Furthermore, AT&T should be precluded from issuing any proprietary calling card unless that card is specifically targeted for use by its customers on a proprietary access code basis, and must remain subject to the same scrutiny as described above. Regardless, if AT&T is succesful in instructing its customers to first dial its proprietary access code (either 10XXX or 1-800/950), whether or not the CIID card information is shared with other OSPs is irrelevant. The AT&T customer truly desiring AT&T reaches AT&T, as proprietary access codes will never be shared.

Therefore, in order to preserve the competitive well being of the calling card market place, and furthermore to benefit the

Consumer by abating confusion and frustration, and in order not to skew one card issuer's advantages based solely upon current aggregator market share, it is imperative that proprietary card issuers be required to consistently market such cards only as proprietary access cards, or to share the billing information of such a card when it becomes evident that such card holders persistently dial "0+" instead of the proprietary access code.

The nature of a "proprietary" card dictates some form of proprietary access. Otherwise the Consumer will never enjoy the benefits of true competition in the calling card market place. Carriers that insist their customers cannot be educated to dial access codes should be required therefore to enter into joint use calling card arrangements with LECs or provide access to their own proprietary card data to all competitive OSPs. To rule otherwise will perpetuate the Consumer frustration and confusion which is the impetus of these proceedings.

4. What information would have to be made available to enable OSPs to carry and bill for non-proprietary "0+" calls?

Since certain IXCs (GTE Airfone) and LECs already enter in to such arrangements with AT&T, there exists the capability of arranging for translation of an AT&T proprietary call record belonging to a non-AT&T carrier into an end user bill. OSPs should simply be permitted to have access to the same or similar services.

The means to perform this translation and subsequent billing are already in place, and therefore no additional investment or expense would be imposed upon the end user.

5. The impact the above described proposal would have on consumers?

Education is the key to Consumer satisfaction. If an end user is dissatisfied with the results experienced with a certain proprietary card, the card issuer should be obliged to resolve the Consumer's complaint without the intervention of regulatory agencies, or lose the end user to a more Consumer sensitive card issuer.

By requiring proprietary cards to be utilized only over proprietary access, and providing incentives to card issuers to inform their customers about currently available means of access, Consumers will benefit by becoming more aware of the product they are purchasing, and benefit from card issuers which are subject to competition on an even playing field, based only on the merits of their long distance services.

The concept that a naive Consumer is better served has long since disappeared from all other facets of our competitive society. It is time for the telecommunications industry to enter the modern, pro-competitive era in order that all Consumers can reap the benefits of competition and product awareness. The Consumer must be made aware of the variety of options available, understand what a "proprietary card" is, and that if he selects to carry a proprietary calling card, he can be assured of reaching that proprietary network from all telephones today by dialing 1-800/950. The cost of the education of the Consumer is therefore imposed upon the newly enlightened Consumer's carrier,

and not upon a presubscribed OSP operator, or upon the Commission by having to respond to the complaints of a frustrated or confused Consumer.

6. The impact this proposal might have on the costs and benefits of billed party preference or the timeliness with which it could be implemented?

By requiring proprietary card issuers to educate their customers to dial the applicable proprietary access code before placing a long distance operator assisted call, the Consumer benefits of a billed party preference system are virtually achieved without the imposition of any costs. ⁴

Informed Consumers make informed choices. Informed choices in a competitive marketplace drive that market towards responding to consumer demand. The mechanisms exist today that alleviate Consumer confusion and frustration, (proprietary cards and 1-800/950 mandatory access) but require explanation to the end users. MCI and Sprint, among many other regional carriers have proven that customer education is possible, and results in customer satisfaction.

⁴ Only in the instance of a collect call or billed to third party call would such a call be carried over a network not predetermined by the billed party. However, if the calling party has utilized a proprietary calling card, it is logical to assume that the calling party believes the rates that will be charged to the called party on a collect call are reasonable, as those same rates apply to the calling party on his calling card calls. Branding requirements instituted in CC Docket 90-313 ensure that the called party on a collect call has knowledge of the call's carrier before accepting the charges. Rate quotes are required to be available should such a called party require that information prior to accepting the call. Compared with even the most modest estimates of the costs of implementing a billed party preference system, this scenario is certainly acceptable.

LECs will soon be inundated with the advent of Competitive Access Providers and will be subject to new competitive forces which could draw necessary investment away from the development and maintenance of a billed party preference system and towards the enhancement of their local services. To require such investment in a billed party preference nation wide network seems imprudent at a time when it is not known to what extent the LECs will be participating in the interexchange access and information market in the years to come.

Simply educating Consumers to reach their preferred carrier, if they have a preference, by dialing an access code eliminates potentially unnecessary investment in an as of yet indeterminable interconnected network, while accomplishing at the same time the goal of Consumer satisfaction.

7. Alternatives to Billed Party Preference

USLD herein proposes that the Commission adopt rules requiring the issuers of proprietary calling cards to bear the responsibility of educating their customers about the existing means of access guaranteed to them under existing Federal regulations.⁵ Since competition for aggregator presubscription has been specifically cited as an impediment to Consumer benefit,⁶ any argument for maintaining the status quo based upon

⁵ 47 C.F.R. 64.704 (a)

⁶ In the Matter of Billed Party Preference for 0+ InterLATA Calls, CC Docket 92-77, FCC 92-169, released May 8, 1992, paragraph 19.

the predominance one OSP enjoys in aggregator presubscription runs contrary to the objective of these proceedings.

This proposal can be achieved by requiring issuers of proprietary calling cards to utilize them as a method of billing the end user only on those occasions when the end user has made the conscious decision to select that carrier. This conscious decision can be affirmed only when the end user has accessed his chosen carrier by dialing that carrier's proprietary access telephone number.

Given this "level playing field," all card issuers will be afforded the opportunity to market their product based solely upon the qualities of their product, long distance services, and no carrier will be able to enjoy the unfair advantage of a perceived ease of access to the network.

In order to ensure all card issuers sincerely participate in the education of their card holders, the Commission should adopt a monitoring process, which could be incorporated into current Operator Service Provider Reporting requirements, specifying a level at which any card issuer's failure to properly instruct their card holders, as measured by those card holders' attempts to access their card issuer on a "0+" basis, mandates that card issuer's customer account information be made available for all Operator Service Providers to utilize as a billing mechanism and can therefore complete Consumers' calls on a "0+" basis, as the customer seems to expect will happen, over their own networks.

By adopting this proposal, the Consumer will enjoy the tremendous benefit of savings ranging in the hundreds of millions

of dollars for an elaborate, interconnected public telecommunications network that may or may not ever be ubiquitously implemented nor universally reliable. As in the case of commercial credit cards, a Consumer would be able to access more than one alternative carrier, based upon his requirements at the point of sale or the prevailing benefits each card issuer may offer from time to time, whereas a Billed Party Preference system would perpetuate the unawareness telecommunications Consumers now are subject to, and exclusively benefit the predominant carrier. As stated previously, a competitive market place works best for the Consumer when the Consumer is fully aware of what he is buying.

CONCLUSION

As a result of the numerous incidences of Consumer complaints of frustration and confusion associated with AT&T's CIID card and the improper instructions associated with it, and the unheralded costs incurred by competitive Operator Service Providers resulting from unbillable call attempts currently encountered due to improper dialing instructions relayed to AT&T customers, the Commission should require that the current AT&T proprietary calling card be made available for all Operator Service Providers in order to allow the Consumer to complete their desired call on a "0+" basis as they expect.

AT&T should be permitted to reissue new calling cards with specific instructions, including the availability of AT&T's mandated 1-800 access number, in order that its customers are

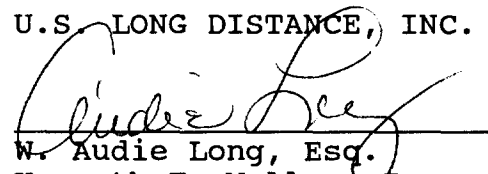
assured of reaching AT&T, if they so desire, without unfairly burdening competitor's networks. Any new proprietary card should be subject to the monitoring requirements outlined above. If AT&T proprietary card holders persistently attempt to reach AT&T by dialing "0+" and their proprietary card number, any new card account information must also be made available to all competitive Operator Service Providers.

These proposals benefit the Consumer, as he will be assured of reaching his preferred carrier, he will not incur the costs of implementing a Billed Party Preference system, and he will become more knowledgeable about the alternatives that exist in the long distance market through fair and equal competitive marketing. These proposals benefit competitive Operator Service Providers, as unbillable network usage costs will be substantially reduced, and aggregator customers will not be pressured into presubscribing to AT&T based upon the prospect of "losing" proprietary card "0+" calls. Finally, the Commission will benefit from a more knowledgeable Consumer, since a decrease in Consumer frustration and confusion regarding calling card calls would necessarily follow.

Respectfully submitted,

U.S. LONG DISTANCE, INC.

by


W. Audie Long, Esq.
Kenneth F. Melley, Jr.
9311 San Pedro, Suite 300
San Antonio, Texas 78216

June 2, 1992